

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 3:06-CR-146-G
	§	<b>ECF</b>
JOHN GEORGELAS	§	

**GOVERNMENT'S MOTION FOR AN ADDITIONAL ONE-LEVEL  
DECREASE FOR ACCEPTANCE OF RESPONSIBILITY**

The United States, by and through the United States Attorney for the Northern District of Texas, moves the Court for an additional one-point decrease in defendant John Georgelas's offense level.

Under U.S.S.G. § 3E1.1(b), the government requests that Georgelas receive an additional one-level reduction in his offense level. Georgelas notified the government of his intention to enter a guilty plea sufficiently early to permit the government to avoid preparing for trial and to allocate its resources elsewhere. Specifically, Georgelas entered into a plea agreement with the government which saved expenses for witness appearances and travel, and saved the time, money, and manpower required to prepare for trial. The government, however, reserves the right to withdraw this motion if Georgelas engages in

conduct inconsistent with acceptance of responsibility.

Respectfully submitted,

RICHARD B. ROPER  
UNITED STATES ATTORNEY

/s/ Linda C. Groves  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the Government's Motion for an Additional One-level Decrease for Acceptance of Responsibility was served on the attorney for defendant by electronic case filing and a copy provided to the U. S. Probation Office on or about July 11, 2006.

/s/ Linda C. Groves  
LINDA C. GROVES  
Assistant United States Attorney